

**To:** Shaw, Hanh[Shaw.Hanh@epa.gov]  
**Cc:** Heather.Ptak@shell.com[Heather.Ptak@shell.com]; Seyfried, Erin[Seyfried.Erin@epa.gov]  
**From:** Greg.Horner@shell.com  
**Sent:** Fri 4/25/2014 12:00:30 AM  
**Subject:** Draft NPDES Geotechnical General Permit (AKG-28-4300) - Whaling Closure  
2014-04-24 Subsistence Mitigation Geotech NPDES GP (Exhibit) pdf - Adobe Acrobat Professional.pdf

Hanh,

Please find attached a letter which presents follow-up to our comment on whaling closures presented in the draft geotechnical general permit (GGP). Our response focuses on pre-existing subsistence mitigation and recommendations to EPA for performance-based mitigation measures.

I look forward to discussing with EPA any questions or comments on the attached.

Sincerely,

Greg Horner  
Shell  
Offshore Regulatory Team Lead